

# Akin Gump

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November 29, 2017

VIA ECF AND EMAIL

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Courtroom 523  
New York, NY 10004

Re: *In re Motors Liquidation Company*, Case No. 09-50026 (MG)

Dear Judge Glenn:

We represent certain unaffiliated holders (the “Participating Unitholders”) of approximately 65 percent of the beneficial units of the Motors Liquidation Company GUC Trust (the “GUC Trust”) in the above-referenced proceeding. On November 13, 2017, the Participating Unitholders filed a Joinder in the Motion to Enforce, a Declaration of Daniel H. Golden, and Related Exhibits in Support Thereof (collectively, the “Joinder Papers”) [ECF Nos. 14153, 14154]. Also on November 13, 2017, the Participating Unitholders filed the *Motion of the Participating Unitholders Pursuant to 11 U.S.C. § 107(b) and Rule 9018 of the Federal Rules of Bankruptcy Procedure Authorizing the Participating Unitholders to File Under Seal the Joinder of the Participating Unitholders in the Motion to Enforce and the Declaration of Daniel H. Golden and Related Exhibits in Support Thereof* (the “Sealing Motion”) [ECF No. 14152].

The Participating Unitholders filed the Sealing Motion because the Joinder Papers include and reference three documents (the “Documents”) that had been marked “Confidential” by producing party Wilmington Trust Company, as trustee for and administrator of the GUC Trust (“Wilmington Trust”). Prior to filing the Joinder Papers, the Participating Unitholders requested Wilmington Trust’s consent to file the Documents on the public docket, but Wilmington Trust refused to provide such consent.

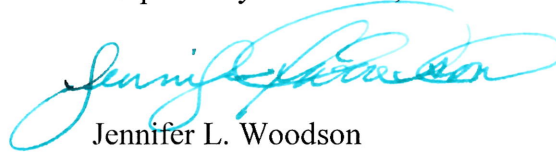
On November 28, 2017, however, Wilmington Trust notified the Participating Unitholders that it no longer objects to the Documents being filed on the public docket. As such, the Participating Unitholders write to notify the Court that they hereby withdraw the Sealing Motion, and intend to file on the public docket the Joinder Papers that were originally submitted to this Court under seal.

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We are available at the Court's convenience should Your Honor wish to discuss this matter further.

Respectfully Submitted,



Jennifer L. Woodson

cc: Counsel of Record (by ECF)